

EXHIBIT G

From: [Eli Mosley](#)
To: [Yotam Barkai](#)
Cc: [eli.f.mosley@gmail.com](#); [Jessica Phillips](#); [Michael Bloch](#)
Subject: Re: FW: Sines v. Kessler
Date: Thursday, December 5, 2019 3:31:03 PM
Attachments: [TwitterPolicy.PNG](#)
[OpOrdCopy.pdf](#)

Hello,

This is in response to my discovery obligations for the case. Please let me know if you have any questions or concerns about what I've provided below.

1. The Twitter Privacy form requires me to enter the email address for the account I am requesting information on. As I've said before, I do not have the email address or know what they were for my Twitter accounts. I used burner email addresses to set them up that didn't have real inboxes that I could gain access to. Please advise what I should do here because it doesn't seem like I can continue online without knowing the email address for the account. I've attached a screenshot of what I see when I try.

2. For the First Set of Document Requests, the only document that was used by myself for Unite the Right was the planning document that is public and was presented to me at my deposition. As I said at that deposition I would just edit the document on google docs and then send it to someone else to edit and post in the planning Discord. It was done as a sort of "living document" where I would just keep editing the same one. I've attached that document I am talking about below as well. Other than that there were no other documents used as described on the First Set of Document Request form.

3. I have attached my response to the interrogatories below.



Kline Response to Interrogatories

I believe this fulfills my Discovery obligations, but please let me know if there is anything else you need from me or have any other questions. I've been told by the discovery vendor that they are sending back one of my phones shortly so I should have more consistent access to my email after that.

Thank you,
Elliott Kline

On Mon, Nov 25, 2019 at 3:32 PM Yotam Barkai <ybarkai@bsfllp.com> wrote:

Yotam Barkai

Associate

BOIES SCHILLER FLEXNER LLP

(t) +1 212 303 3643

From: Michael Bloch [mailto:mbloch@kaplanhecker.com]
Sent: Monday, July 1, 2019 8:32 PM
To: eli.f.mosley@gmail.com
Cc: Gabrielle E. Tenzer <gtenzer@kaplanhecker.com>
Subject: Sines v. Kessler

Mr. Kline:

We are writing to provide information and materials to help you comply with the Court's June 21 Order concerning the pending motion for sanctions against you. The June 21 Order references its previous orders that detail your obligations in discovery. Those orders are attached here for your convenience. (ECF Nos. 287, 379, 383, 440, and ECF No. 282, at 23-24.)

Regarding your discovery obligations, the June 21 Order requires, among other things, the following:

- Provide complete and accurate written answers or responses to Plaintiffs' First Set of Interrogatories and Requests for Production of Documents, as required by the Court's Order of March 26, 2108, ECF No. 224. Plaintiffs' First Set of Interrogatories and Requests for Production of Documents are attached.
- Give Plaintiffs' counsel a complete and accurate Stored Communications Act ("SCA") consent form allowing Discord to produce any discoverable documents or electronically stored information ("ESI") in response to Plaintiffs' subpoenas, as required by the Court's Order of November 13, 2018, ECF No. 379. A copy of the SCA consent that you must fill out is attached. Once you fill out the document, you must e-mail it from the e-mail address that is associated with the Discord account to sca@bsflp.com. If you had or have more than one Discord account that contained potentially relevant documents, you must fill out a consent form for each account.
- Complete consent forms giving Plaintiffs' counsel access to any other social media accounts (e.g., Facebook, Twitter, Gab) that you used to communicate about the Events at issue in this lawsuit, regardless of whether those accounts have been disabled, suspended, or deleted. We have attached to this email an authorization form from Twitter that will allow data to be recovered from suspended or disabled accounts and sent to a third-party vendor for imaging.
 - Please complete the attached consent form. Once the form is complete, please submit a request through the privacy form at <https://help.twitter.com/forms/privacy>. In the section of the form

entitled, “**Please enter the specific information you are requesting:**”, you must do two things:

(a) specify what content and data you are requesting (which should be identical to the data requested in the consent form). Specifically, the data you should request is as follows: Profile Data, Followers, Following, Tweets (and retweets), Replies, Notifications, Messages (Direct Messages or “DMs”), Any other items we would expect to find if we were viewing your live twitter account with full access and control.

(b) list the discovery vendor’s email address as the email address where the content and data should be sent (bwilliams@idsinc.com and kkim@idsinc.com). (Note that in the section entitled, “**The email address associated with your Twitter account**”, the account-holder must enter the email address associated with their suspended Twitter account -- not the discovery vendor’s email address.)

- It is important that the consent form is submitted via email before the privacy form request is submitted. After Twitter receives and validates both the paper consent form and the privacy form request, Twitter will email any requested and reasonably available content and data to the third-party discovery vendor.
- Comply immediately with each of the following provisions in the Stipulation and Order for the Imaging, Preservation and Production of Documents, ECF No. 383 (“Imaging Order”), as required by the Court’s Orders of November 19, 2018, ECF No. 383 and March 4, 2019, ECF No. 440:
 - Execute the Third-Party Discovery Vendor contract. That contract will be sent to you by the third-party vendor via e-mail.
 - Complete and provide to Plaintiffs’ counsel the Certification Form attached as Exhibit A to the Imaging Order, ECF No. 383, at 16. That document is attached.
 - Make available to the Third-Party Discovery Vendor for imaging and collection any Electronic Devices or Social Media Account identified in the Defendant’s Certification Form. For any questions, contact Ken Kim at kkim@idsinc.com.

If we can further assist in your compliance with the Court’s orders regarding your discovery obligations, feel free to contact me at this address.

Michael Bloch | Kaplan Hecker & Fink LLP

Counsel

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New York, New York 10118

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Tell us about yourself

Your full name

Elliott Kline

Your Twitter username

@ EliMosley

The email address associated with your Twitter account

Your country of residence

United States

Please enter the specific information you are requesting:

items we would expect to find if we were viewing your live twitter account with full access and control. Please send this information to bwilliams@idsinc.com and kkim@idsinc.com

If your contact email differs from the email associated with the Twitter account, please also include your contact email in this section.

Signature

Elliott Kline

Please enter your full name as provided above.

I affirm that I am the account holder of the above mentioned Twitter account and that I am requesting my own Twitter account information.

Operation Unite the Right Charlottesville 2.0

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Report Version:

8/10/2017 General Orders

ATTENTION: Please read this full document to avoid miscommunication or organizational issues.

Final Operation Order Summary:

The city of Charlottesville has told us we must move our rally to McIntire Park while still allowing the counter protesters to keep their permits nearby. Our legal team has filed an injunction and we are waiting to see if we are given an emergency hearing or not. Regardless of the outcome, we will be at Lee Park on Saturday. It is highly important to keep a close eye on communications as things could change by the hour throughout the entire weekend.

Friendlylies:

We are expecting to have a large number of friendly people attend this rally ranging from Alt-Lite, Oath keepers, Proud Boys, and Trumpists to Identitarians, Neo-Confederates, national socialists and other Alt Right groups. It is important that every group regardless of ideological differences work together at the event.

Enemies/Counter Protesters:

We have been monitoring Antifa and other leftist activities for months leading up to the event and are anticipating well over 3000 counter protesters from across the country. These groups range from local Charlottesville residents or students from UVA to full-fledged Antifa members and groups.

Also, there are the potential of enemies within the right from our own ranks. Various Proud Boys and White Nationalist groups are coming to the event as opposition in unknown numbers with unknown intentions.

Discord:

On the day of the rally please keep discord and @everyone tags clear outside of critical information sharing.

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Doxing/Security Concerns:

The day of the rally it is imperative that everyone realizes they risk being doxed simply for being in town that day. We advise you shut down at least temporarily any social media that may comprise you to limit the chances. DO NOT use credit/debit cards or checks in any stores in or outside of town. Use cash only. Assume every store clerk within an hour radius of the town are hostile. Realize that everyone around you will be recording so come up with nicknames for people to help prevent doxing.

It is important that you stay in teams at all times on Friday and Saturday. We do not want anyone getting hurt so please do not stray from your group or if you have no group find one ASAP.

Women:

We strongly encourage women to stay off the front lines and help setup with the after party. Within the Wheatfield Dwellers chat on the night of Friday the location for the alternative location will be given to vetted women. The plan will be for women (and others) not attending to help support our efforts on social media, intel gathering, and preparing for the after party.

Friday Night:

We HIGHLY recommend that you do not go out Friday night into the downtown areas or local businesses in Cville. All businesses should be assumed hostile.

Weather:

We are monitoring that it could potentially rain Friday and/or Saturday. Stay tuned for potential changes depending on the weather and be prepared. The current forecast is for scattered thunderstorms on Friday and Saturday.

Bathrooms:

We recently had our porta johns removed so please use the bathroom before the rally. If you must use the bathroom at the rally we will have places for people to go in large groups.

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Legal:

Overall: After the rally we will be creating a channel for legal help/questions/requests only. As long as you are within the rules set by the event we will get our team to help you. We will be putting out a general legal fund on Wednesday that will be for the permit case, potential cases against businesses, and incidents that occur at the rally.

Permit: All that everyone needs to know right now is that we are working with a team of various lawyers in advising us and trying to reverse the city forcing us to McIntire Park. We are operating under the idea that we will most likely win this case and the police forced to go through with our initial plan, but also preparing for that not to happen.

Lodging/AirBnB Cancellations: We are aware that many of you have had your lodging canceled. We understand this is a huge issue and we are working with the legal team on trying to remedy this ASAP, but operate under the assumption that you will not get that money (right away) or reservation back. We encourage anyone with extra space to reach out to help these people. We may bring a legal case forward in relation to these and other tools at our disposal afterwards.

Incidents at the Rally: If you are arrested at the rally or for something directly related to the rally we will have money and a legal team set aside for you after. It is important that you get in touch with the organizers (Eli Mosley or Jason Kessler) ASAP if that happens. We will only be able to help people who follow the rules and stick to the plan so please understand that as you read on in the document.

IMPORTANT: If we lose our court case and have to initiate plan red or have to take the ground by force with plan yellow it is VERY important that people realize that any court case will be incredibly difficult regardless how in the right we are. Keep this in the back of your mind as if you are arrested your identity will also be revealed by local records.

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Packing List and Equipment Information:

Guns/Open Carry/Closed Carry: We will not prevent anyone from carrying their weapons LEGALLY, but will discourage anyone from bringing one who is not up to date on VA state laws. Essentially, if you use your weapon it will become the highlight of the rally and the movement as a whole, they will go through your social media and attempt to charge you with a hate crime regardless of how in the right you are to self-defense. Our protection overall will be from our numbers and the people who are experienced/trained with a firearm (and potentially the police, more below). So bring a weapon if you have absolute confidence in yourself and the risks involved. Consult this link for more info: <https://www.nrila.org/gun-laws/state-gun-laws/virginia/>

Knives/Tasers: We are not going to bring any knives or Tasers with us to this rally. After consulting our legal advisors and reviewing VA State law and local laws there is no reason for us to risk having them. This includes switch blades, bowie knives, and machetes. If you do have a knife and end up using it we will not be able to provide legal help through our team.

Masks/Facecoverings/Gas Masks: These are all incredibly illegal in VA and we expect the police to vigorously uphold this law regardless of their status. With that being said, if you do have a respirator or small gas mask you may bring it, but keep it concealed. This could be taken away, you could be arrested for it, and you probably won't need it, but if you feel safer or have a medical condition where it makes sense we will not keep you from having one. If you do get in legal trouble for the mask our legal team will most likely be unable to help depending on the circumstances.

Flags/Flagpoles/Shields: The police have not given us any solid guidelines on these. We recommend not using wood sticks or anything else that could be deemed a weapon, but instead you should use a hollow plastic pipe or something light. If a fight breaks out you should try to avoid using your flag as a weapon if possible. Shields should be brought but could be confiscated by the police. Comply with all police orders in relation to the shields and do not use them as offensive weapons. The key to keeping out of trouble is using them as defensive tools only.

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Helmets: We recommend you bring or wear something to protect your head. DO NOT include a helmet with a facemask or anything that can be grabbed onto by others.

Pepper Spray: You may bring pepper spray but under your own risk and it is highly discouraged. Pepper Spray is legal in VA but if it hits a bystander or a bystander claims to have been hit you can be charged. If you feel you must have pepper spray you should use the gel type to provide more accuracy.

Water/food Source: It is EXTREMELY important that you bring a water source as we no longer have a guaranteed area for our water coolers. It will be very hot that day and/or it could be raining. We recommend a Camelback system if possible.

Tiki Torches/Oil: The torchlight part of the rally is still secret, but people should bring as many of these as we can for the Friday night torchlight vigil. DO NOT hit any potential counter protesters with them, and we will have a disposal area for them on site.

Rules of Engagement:

It is extremely important that we avoid extreme violence at all costs outside of what is needed to defend our people. Do not aggress towards the counter protesters or start any fights. If you are carrying follow the state law of VA and realize that if you use your weapon there is a high likelihood the court will treat you harshly/unfairly. Allow the police to do their job. As we saw at the KKK rally the police were incredibly hands on, and in our communications with them they know that the left are the ones looking to do violence.

General Conduct:

We would like to keep this rally as open and friendly as possible with the "Unite the Right" message which means we should refrain from being overly edgy for the sake of edginess. There will be no speech police on our side, but realize that we are trying to gain sympathy from whites and the general right wing. Please refrain from roman salutes during the rally and understand that cameras are all over the place at all times.

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Underage Drinking:

We have a zero tolerance policy for anyone under 21 drinking at any point over the weekend. If you get booked they will know you are part of this rally and we could keep you from future events.

Social Media:

Make sure you are following these accounts on twitter for updates:

@awyattman88
@NotEliMosley
@TheMadDimension
@occdissent
@RichardBSpencer
@NotMikeEnoch

Pay attention in Discord and those accounts to see the hashtags we are using. It will be important to make sure everyone not at the event is using their social media to amplify what is going on.

Mission Summaries:

We will have 3 separate plans right now depending on the circumstances of the day. The overall goal regardless of circumstances is to hold our rally at Lee Park, protect our VIPs and attendees, and get everyone out safe.

There will be multiple decision points that could shift the working plan due to updates on the ground. We will proceed under the assumption that we are acting on Plan Green until we receive more information.

Plan Green: This plan will be used if we have the police still on our side and willing to move forward with our original plan. It is most likely to be used if we win our court case for the permit. In this scenario we will be providing shuttles from Rally Point 1 to and from Lee Park. Attendees should be at the Rally point no later than 1030.

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Plan Yellow: The police could potentially refuse to secure the area around Lee Park for us, and may not maintain a buffer between us and antifa. In this scenario we would need to accelerate our plans. This would happen if we don't win the court case but police are either willing to provide some protections, or will stand down. The main changes will be getting as many of our people at Lee Park early in the morning to secure the grounds and starting the speeches at around 1000.

Plan Red: The police will no longer provide protection and intend on being hostile to or arresting any of our people in Lee Park. but we will STILL be going to Lee Park. This plan is going to be incredibly dangerous and anyone still going could be arrested. We will essentially meet early at Rally Point 1, do our speeches, and then anyone who wants to engage in civil disobedience by going to Lee Park will march there.

Torchlight Rally:

The Torchlight Rally will be at the Jefferson Monument near the UVA campus on Friday the 11th under cover of darkness. We will meet at 2130 in "Nameless Field" and march with our torches lit to the monument. DO NOT show up early to "Nameless Field". Each person should bring their own torch which can be bought from a local Wal-Mart, Lowes, Home Depot, etc. Tiki torches are fine. Once on the grounds of the monument a speech will be given, we do some chants, then sing dixie, then put out the torches. We will then return to "Nameless Field" and back to our cars.

DO NOT mention this torchlight beforehand outside of extremely vetted circles. DO NOT post about it on social media until after.

Dixie:

At the torchlight rally we will be singing the song "Dixie". It is VERY important for everyone to learn this song and the lyrics. In announcements we will put out the version we are using.

Pre-Rally and Transportation:

Small groups should and individuals should not travel to the park outside of the group transportation services. The details of the transportation plan will be released Friday evening. However, the general plan is that we will

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have a transportation Rally Point where people may park. EVERYONE SHOULD CARPOOL TO THE RALLY POINT. This is to reduce the number of vehicles that can be sabotaged, and to make the best use of the limited parking. The transportation team will shuttle people from that point to the gate of the park, or to the Line of Departure if our shuttles are not allowed to pass the police cordon.

If we are not allowed to pass the police cordon in vehicles, we will form all forces at the Line of Departure and march into the park together, using the shield wall to keep hostile forces away from our civilians and HVT's.

During the Rally:

Due to the fluid situation we should not expect the police to maintain any type of barriers between us and the hostiles. Our security forces in form of the shield wall will be deployed in whatever manner is most effective to reduce the threat. Anyone not on the security and support staff should stay away from the edges of the park as well as the rear area of the park that is in enfilade from the hostile positions.

Our port-a-johns have been cancelled as most people know, therefore the logistics of making head calls has been increased. Once the police confirm what places will be open to us for these purposes we will post them on the map. These locations will not be within the secured area, so everyone is advised to move in groups of at least 10. If you need to use the head, gather at the Southeast Entrance of the park and wait until you have enough people to safely traverse the area.

Leaving the Rally:

Once the speakers have finished, we will teardown the support equipment and police call the area. Please do not leave any trash on the ground. Leave the area cleaner than you found it! If we are allowed to shuttle to the park directly we will begin running exfiltration convoys to the Rally Point until all civilians are evacuated, at which point the support and security staff will work in a rear guard action until all personnel are evacuated.

If we are not allowed to shuttle directly to the park we will tear down all the equipment, and march out of the park to an exfiltration point outside of the cordoned area. Once at the exfiltration point we will have the shuttle

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service return everyone to the rally point while security fights a rearguard action.

When you are leaving the rally in your personal vehicle do not travel directly to the afterparty location or to your lodging. Take basic evasive maneuvers, get on a highway for several miles and get off, have your passengers check for vehicles following you. If you suspect a vehicle is following you, pull off the road in a well populated area, like a grocery store parking lot and call the police if the vehicle follows you into and out of the parking lot.

It is of our utmost concern that our afterparty location is not compromised, so take every precaution to ensure you are not followed.

After Party:

Our two original after party locations were both pulled as well as the food due to the leftist networks bullying local business. We will still be having an after party but will need to be more exclusive about who can come because of the size of our new venue. Anyone who purchased a ticket already can come, but further ticket sales will be suspended. Obviously this is not ideal and we encourage groups to have their own parties as well.

You may use [THIS](#) link to send the money through PayPal. Send a note with your payment letting us know what name or email you want on the guest list.

Conclusion:

The basic plan is to meet at 2130 (930pm) at "Nameless Field", do the torchlight rally, and then head off. The next day will start at McIntire Park Saturday, the time will be dependent on the situation with the police/court case, pay close attention to comms to know exactly when. Regardless of the situation we will be going to Lee Park.

The main things to note are to keep attention to communications, everyone stay safe, be ready for rapid and constant change, please pay attention to your leadership, and the announcements channel in discord.

Answering each interrogatory individually:

1. To communicate for Unite the Right I primarily used the Discord account that has already been sent to discovery Eli Mosley#5269. You are asking for an 18 digit identifier that I am unsure what that is. The discord account listed above was banned so I no longer can login in to find any sort of code for the account. I also used some or all of the following Twitter accounts that I currently do not have access to because of account deletion/banning by Twitter: @thatelimosley, @notelimosley, @elimosleyie, @eli_mosley_, @sheli_shmosley, @EliMosley, @EliMosleysBack, @EliMosleyOH.
2. I primarily used the "Charlottesville 2.0" Discord to make all communications about Unite the Right, but we also had one setup that was for the first time we went to Charlottesville. I also communicated in Identity Evropa's discord about the event. As I previously said, my Discord account has been banned so I no longer have access to login to see the specific names of these servers but I do authorize Discord to provide whatever data is needed for discovery.
3. Most of the people that I communicated with in the Alt Right used pseudonyms to go by, but the people I remember communicating with about the event before, during or after are: Jason Kessler, Richard Spencer, Christopher Cantwell, Andrew Anglin, Azzmador, Nathan Damigo, Matthew Heimbach, Michael Hill, Augustus Invictus, Michael Peinovich, Erica (don't remember last name but in other court documents) and Patrick Casey.
4. The primary communication device I used before, during and after the event was the 610-406-2229 iPhone that has already been sent in for discovery. I also used a walmart phone after the event for a short period of time and currently have a new cell phone. All three of these phones are currently with the Discovery vendor. The only other Electronic devices I used were laptops owned by other defendants Richard Spencer and Nathan Damigo, but both of those laptops were used very rarely.